

**FACILITY RESPONSE PLAN TECHNICAL REVIEW CHECKLIST**  
**DOCKET NO 06- AR - 00042**

DESCRIPTION	Present Y/N/NA	Adequate Y/N/NA	Page	Comment # See below
<b>I DID THE FACILITY SUBMIT A RESPONSE PLAN</b>	Y			
<b>A RESPONSE PLAN COVER SHEET</b>	Y	N	22-24	#1
<b>B EMERGENCY RESPONSE ACTION PLAN (Sec. 1 1)</b>	N			Not single section
EMERGENCY RESPONSE COORDINATOR INFORMATION (copy Sec 1 2)	N			
EMERGENCY NOTIFICATION LIST (copy Sec 1 3 1)	N			
SPILL RESPONSE NOTIFICATION FORM (copy Sec 1 3 1)	N			
FACILITY RESPONSE TEAM LIST (copy Sec 1 3 3)	N			
EQUIPMENT LIST (copy Sec 1 3 2)	N			
FACILITY EVACUATION PLAN (copy Sec 1 3 4)	N			
IMMEDIATE ACTIONS (copy Sec 1 7)	N			
FACILITY DIAGRAMS (copy Sec 1 9)	N			
<b>C FACILITY INFORMATION (Sec 1 2)</b>				
FACILITY NAME	Y	Y	3	
STREET ADDRESS	Y	Y	22	
CITY STATE ZIP	Y	Y	3	
COUNTY	N			
PHONE NUMBER	N			
LAT/LONG INFO	Y	Y	23	
WELLHEAD PROTECTION AREA	N			
OWNER/OPERATOR INFO (IF DIFFERENT FROM FACILITY INFO)	N			Pg 25 letterhead indicates owner address not same as facility
EMERGENCY RESPONSE COORDINATOR INFORMATION	N			
OIL STORAGE START UP DATE	N			
FACILITY OPERATIONS DESCRIPTION	Y	N	3	Not enough description
SIC CODE	Y	Y	22	

NOTE Reviewed  
 Renumbered  
 pages of  
 FRP

as facility

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DATES AND TYPES OF SUBSTANTIAL EXPANSION	N			
<b>D EMERGENCY RESPONSE NOTIFICATION</b> (Sec 1.3)				
<i>NOTIFICATION (Sec 1.3.1)</i>				
EMERGENCY NOTIFICATION PHONE LIST	N			
NRC PHONE NUMBER	N			
ERC DAY AND EVENING PHONE NUMBERS	N			
COMPANY RESPONSE TEAM DAY AND EVENING PHONE NUMBERS	N			
OSC DAY AND EVENING PHONE NUMBERS (EPA HOTLINE 214-655 2222)	N			
AREA COMMITTEE DAY AND EVENING PHONE NUMBERS (SAME AS ABOVE)	N			
LOCAL RESPONSE TEAM PHONE NUMBERS (i.e. FIRE DEPT)	N			
FIRE MARSHAL DAY AND EVENING PHONE NUMBERS	N			
SERC DAY AND EVENING PHONE NUMBERS	N			
STATE POLICE PHONE NUMBER	N			
LEPC PHONE NUMBER	N			
LOCAL WATER SUPPLY SYSTEM DAY AND EVENING PHONE NUMBERS	N			
WEATHER REPORT PHONE NUMBER (NATIONAL WEATHER SERVICE)	N			
LOCAL TV/RADIO PHONE NUMBER(S) FOR EVACUATION NOTIFICATION	N			
HOSPITAL PHONE NUMBER	N			
SPILL RESPONSE NOTIFICATION FORM	N			
<b>E EQUIPMENT (Sec. 1.3.2)</b>				
LIST AND DESCRIPTION OF EQUIPMENT AT FACILITY				
SHOULD HAVE 1000 FEET OF ROOM	N			
LOCATION OF EQUIPMENT	N			

**FACILITY RESPONSE TEAM TECHNICAL REVIEW CHECKLIST**  
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DESCRIPTION	Present Y/N/NA	Adequate Y/N/NA	Page	Comment # See below
OPERATIONAL STATUS OF EQUIPMENT	N			
LAST EQUIPMENT TEST OR INSPECTION DATE	N			
LIST OF CHEMICAL DISPERSANTS AND NCP PRODUCT SCHEDULE STATUS	N			
DISCUSSION OF OSC APPROVAL FOR DISPERSANT USE OR PREAPPROVAL	N			
EFFECTIVE DAILY RECOVERY RATE (IF APPLICABLE)	N			
<b>PERSONNEL (Sec 133)</b>				
FACILITY RESPONSE TEAM INFORMATION A) NAME B) PHONE C) RESPONSE TIME D) RESPONSIBILITY E) TRAINING	N			
EMERGENCY RESPONSE CONTRACTOR INFORMATION A) NAME B) PHONE C) RESPONSE TIME D) RESPONSIBILITY	N			
EVIDENCE OF CONTRACTUAL AGREEMENT	Y	N	25	Not actual contract
<b>EVACUATION PLANS (Sec 134)</b>				
FACILITY EVACUATION DIAGRAM A) LOCATION OF STORED MATERIAL B) HAZARD POSED BY SPILLED MATERIAL C) SPILL FLOW DIRECTION D) PREVAILING WIND DIRECTION & SPEED E) WATER CURRENTS TIDES OR WAVE CONDITIONS F) EVACUATION ROUTES G) ALTERNATIVE ROUTES H) LOCATION OF ALARM/NOTIFICATION SYSTEM I) REGROUP LOCATION J) COMMAND POST	N			
FACILITY EVACUATION PLAN	N			

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**FACILITY RESPONSE PLAN TECHNICAL REVIEW CHECKLIST**  
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DESCRIPTION	Present Y/N/NA	Adequate Y/N/NA	Page	Comment # See below
COMMUNITY EVACUATION PLAN & DIAGRAM (IF NECESSARY)	N			
<b>COORDINATOR S DUTIES (QI) (Sec 1 3 5)</b>				
DESCRIPTION OF RESPONSIBILITIES OF ERC (QI)	N			
STATEMENT OF ERC s/(QI) ABILITY TO COMMIT MONIES	N			
<b>F HAZARD EVALUATION (Sec 1 4)</b>				
<b>HAZARD IDENTIFICATION (Sec 1 4 1)</b>				
TANK AND SURFACE IMPOUNDMENT FORMS	N			
A) EACH TANK HAS DISTINCT IDENTIFIER	N			
B) MAXIMUM CAPACITY	Y - - - - Y - - - -		7	
C) AMOUNT STORED	22			
D) SUBSTANCE STORED	22			
E) TANK TYPE	Y - - - - N - - - -		7	
F) AGE	22			
G) PREVIOUS SPILL/FAILURE	22		11	
LABELED SCHEMATIC DRAWING	N			
DESCRIPTION OF TRANSFERS & VOLUME OF MATERIAL	N			
DESCRIPTION OF DAY TO DAY OPERATIONS THAT MAY PRESENT A SPILL HAZARD	N			
SECONDARY CONTAINMENT VOLUME	Y	Y?	6	#2
NORMAL DAILY THROUGHPUT	N	NA		Term al operations
<b>VULNERABILITY ANALYSIS (Sec 1 4 2)</b>				
DESCRIPTION OF DOWNSTREAM DISTANCE THAT COULD BE AFFECTED	Y	N	24 25	#3
DESCRIPTION OF HUMAN POPULATIONS WITHIN THAT DISTANCE	N			
DESCRIPTION OF SENSITIVE ENVIRONMENTS & DRINKING WATER INTAKES	Y	N	1	Not enough descrip tion, where exactly is drinking water intake?
DESCRIPTION OF AREAS OF ECONOMIC IMPORTANCE WITHIN THAT DISTANCE	N			

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**FACILITY RESPONSE PLAN IF/CLINICAL REVIEW CHECKLIST**  
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DESCRIPTION	Present Y/N/NA	Adequate Y/N/NA	Page	Comment # See below
<b>ANALYSIS OF THE POTENTIAL FOR A SPILL (Sec 1 4 3)</b>				
DESCRIPTION OF LIKELIHOOD OF RELEASE OCCURRING A AGE OF TANK B SPILL HISTORY C VULNERABILITY TO NATURAL DISASTER	N			
DESCRIPTION OF SEVERITY OF CONSEQUENCES	N			
<b>SPILL HISTORY INFORMATION (Sec 1 4 4)</b>				
BRIEF DESCRIPTION OF FACILITY S SPILL HISTORY INCLUDING A) DATE OF DISCHARGE B) CAUSES C) MATERIAL DISCHARGED D) AMOUNT DISCHARGED E) AMOUNT REACHING WATER F) EFFECTIVENESS OF SEC CONT G) CLEAN UP ACTIONS TAKEN H) STEPS TAKEN TO REDUCE RECURRENCE	N			
<b>G DISCHARGE SCENARIOS (1.5)</b>				
<b>SMALL AND MEDIUM DISCHARGES (Sec 1 5 1)</b>				
VOLUMES FOR SMALL AND MEDIUM DISCHARGES PROVIDED	N			
DESCRIPTION OF SMALL AND MEDIUM DISCHARGE SCENARIOS INCLUDING A LOADING/UNLOADING RACKS B FACILITY MAINTENANCE C PIPING D PUMP STATIONS AND SUMPS E STORAGE TANK F VEHICLE REFUELING AREAS	N			
<b>WORST CASE DISCHARGES (Sec 1 5 2)</b>				
COMPLETED WORKSHEET CORRECT WORST CASE DISCHARGE CALCULATION	Y	N	22, 24	See review & calcs
DESCRIPTION OF WORST CASE DISCHARGE SCENARIO	N			
<b>H DISCHARGE DETECTION SYSTEMS (1.6)</b>				

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**FACILITY RESPONSE PLAN II CLINICAL REVIEW CHECKLIST**  
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DESCRIPTION	Present Y/N/NA	Adequate Y/N/NA	Page	Comment # See below
<b>DISCHARGE DETECTION BY PERSONNEL (1 6 1)</b>				
DESCRIPTION OF TANK AND APPURTENANCE TESTING	N			
DESCRIPTION OF EXTERNAL AND INTERNAL INSPECTIONS	Y	Y	7, 8	
DESCRIPTION OF INITIAL RESPONSE ACTIONS IF SPILL DISCOVERED	N			
<b>AUTOMATED DISCHARGE DETECTION (Sec 1 6 2)</b>				
DESCRIPTION OF AUTOMATED SPILL DETECTION EQUIPMENT	N			
DESCRIPTION OF PLAN TO VERIFY ALARM AND INITIAL RESPONSE ACTIONS ONCE VERIFIED	N			
<b>I PLAN IMPLEMENTATION (1 7)</b>				
<b>RESPONSE RESOURCES (Sec 1 7 1)</b>				
DISCUSSION OF PERSONNEL AND EQUIPMENT (SMALL DISCHARGES) A 1000 BOOM TO IMMEDIATELY DEPLOY B OIL RECOVERY DEVICES = TO TWICE THE DISCHARGE C STORAGE = TO TWICE THE EFFECTIVE RECOVERY RATE * ARRIVAL TIME = 2 HRS	N			
DISCUSSION OF PERSONNEL AND EQUIPMENT (MEDIUM DISCHARGES) A BOOM SUFFICIENT QUANTITY B OIL RECOVERY = TO 50% OF THE PLANNING VOLUME C STORAGE = TO TWICE THE RECOVERY RATE * ARRIVAL TIME = 6 HRS FOR HIGH VOLUME PORTS & 12 HRS FOR OTHER AREAS	N			
DISCUSSION OF PERSONNEL & EQUIPMENT (REQUIRED FOR WORST CASE)	N			

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DISCUSSION OF RESPONSE CONTRACTOR (IF NECESSARY) A EQUIPMENT B PERSONNEL C TRAINING D EXPERIENCE	N			
WORKSHEET FOR RESPONSE RESOURCES FOR WORST CASE DISCHARGE (APPENDIX F 1)	N			
DISCUSSION OF ADEQUATE STORAGE FOR RECOVERED OILY MATERIAL	N			
<i>DISPOSAL PLANS (Sec 1 7 2)</i>				
DESCRIPTION OF DISPOSAL PLANS (I E PERMITS)	N			
<i>CONTAINMENT AND DRAINAGE PLANNING (Sec 1 7 3)</i>				
DESCRIPTION OF CONTAINMENT AND DRAINAGE PLANS	Y	N	6 7	Construction materials, valves/separators, sump pump capacities
<b>J SELF-INSPECTION, TRAINING, AND MEETING LOGS (I 8)</b>				
<i>FACILITY SELF INSPECTION (Sec 1 8 1)</i>				
TANK/SURFACE IMPOUNDMENT INSPECTION LOG (Sec 1 8 1 1)	N			
RESPONSE EQUIPMENT INSPECTION LOG (Sec 1 8 1 2)	N			
SECONDARY CONTAINMENT CHECKLIST (Sec 1 8 1 3)	N			
<i>MOCK ALERT DRILLS (Sec 1 8 2)</i>				
MOCK ALERT DRILL LOGS (Sec 1 8 2 1)	N			
TRAINING AND MEETING LOGS (SEC 1 8 2 2)	N			
DISCHARGE PREVENTION MEETING LOGS (Sec 1 8 2 3)	N			
<b>K DIAGRAMS (Sec 1 9)</b>				
SITE PLAN DIAGRAM	N			
SITE DRAINAGE PLAN DIAGRAM	N			
SITE EVACUATION PLAN DIAGRAM	N			

FACILITY RESPONSE ILLAN TECHNICAL REVIEW CHECKLIST  
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DESCRIPTION	Present Y/N/NA	Adequate Y/N/NA	Page	Comment # See below
L SITE SECURITY (Sec 110)				
DESCRIPTION OF FACILITY SECURITY	✓	N	10	Emergency cut-offs, guard duties, Pipeline com caps

Comment

- 1) Largest tank, max storage capacity, number of tanks (should be 9 tanks), worst case discharge.
- 2) Are the 4-285 bbl tanks located w/ the dike area? If so, secondary containment is adequate. Even if ~~all tanks~~ ~~have~~ ~~ade~~
- 3) Worst case discharge not calculated correctly, even if all tanks have adequate secondary containment (see reviewer's calcs). Not clear on where Arkansas River is in relation to facility. If ~~river~~ ~~is~~ wetland flows into river then applicant used correct procedure to calc planning distance. If ~~river~~ land lies between river & facility, applicant should also look at over land transport.

Kathryn Zwiefery  
REVIEWER 1

1-31-94

DATE REVIEWED

QC CHECK

DATE QC CHECK

REVIEW COMPLETED

ON HOLD PENDING ADDITIONAL  
INFORMATION



check worst case discharge:

Assuming All tanks have adequate secondary containment (which we don't know):

This facility is adjacent to navigable waters, so worst case discharge =

$$(1.1) (80,000 \text{ bbl}) * (42 \text{ gal/bbl}) = \underline{3,696,000 \text{ gal}}$$

Applicant did not increase max storage capacity by 10%.

Applicant calculates

wcd = 3,150,000 gallons, incorrect procedure even if all tanks have adequate secondary containment.